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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RODNEY MOTT,

Plaintiff,

vs.

TRINITY FINANCIAL SERVICES, LLC; and
TRINITY RECOVERY SERVICES, LLC,

Defendants.

Case No.: 2:17-cv-01754-RFB-GWF

**STIPULATION FOR EXTENSION OF
TIME**

(FIRST REQUEST)

Pursuant to LR 6-1 and LR 26-4, Plaintiff and Defendants Trinity Financial Services, LLC and Trinity Recovery Services, LLC (collectively, "Defendants"), by and through their respective counsel of record, hereby stipulate and request that this Court extend the discovery deadline by sixty (60) days. At this time, the parties are not seeking an extension of any other

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discovery deadlines but reserve the right to request in the future depending on adjudication of Plaintiff's Motion for Leave to Amend, ECF Dkt. 8. In support of this Stipulation and Request, the parties state as follows:

I. DISCOVERY COMPLETED TO DATE

1. Plaintiff filed the instant complaint on June 26, 2017. ECF Dkt. 1.
2. On August 4, 2017, Defendants filed their answers. ECF Dkt. 4, 5.
3. On September 15, 2018, Plaintiff served his Initial Disclosures.
4. On September 18, 2017, Plaintiff moved for leave to amend his complaint. ECF Dkt. 8.
5. On September 28, 2017, the Court granted the parties' stipulated protective order. ECF Dkt. 11.
6. On October 10, 2017, the Court granted the parties' stipulated discovery plan and scheduling order. ECF Dkt. 17.
7. On October 13, 2017, Plaintiff propounded his First Set of Requests for Production and Interrogatories on Defendants.
8. On November 17, 2017, Defendants responded to Plaintiff's First Set of Requests for Production and Interrogatories.
9. On December 9, 2017, Plaintiff served his First Supplemental Disclosures.
10. On December 12, 2017, the parties conducted a Rule 26-7 conference regarding Defendants' responses to Plaintiff's First Set of Requests for Production and Interrogatories.
11. On January 25, 2018, Defendants provided their First Supplemental Responses to Plaintiff's First Set of Requests for Production and Interrogatories.
12. On February 9, 2018, the parties submitted an interim status report. ECF Dkt. 22.
13. On March 20, 2018, Plaintiff propounded his Second Amended Notes of Deposition on Defendants, setting the date of the depositions of both defendants for April 9,

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1 2018.

2 14. On March 22, 2018, Plaintiff served his Second Supplemental Disclosures.

3 **B. Specific Description of Discovery that Remains to be Completed**

4 1. The depositions of Defendants;

5 2. Depositions and discovery to any third party witnesses; and,

6 3. Any necessary additional written discovery.

7 **C. Reasons Why the Remaining Discovery Was Not Completed**

8 The parties aver, pursuant to LR 6-1, that good cause and excusable neglect exists for the
9 requested extension. Plaintiff propounded his notices of deposition timely on March 20, 2018,
10 setting the depositions of Defendants for April 9, 2018; however, he was informed shortly
11 thereafter that opposing counsel will be out of the country from April 6-20, making it impossible
12 to take the depositions prior to the current discovery cutoff. Plaintiff only became aware of this
13 fact after propounding the deposition notices. The parties have acted expeditiously to remedy
14 this unexpected scheduling issue, and are working in good faith to arrange deposition dates, with
15 depositions to occur likely in late April or early May.
16

17 In order to facilitate the orderly process of taking Defendants' depositions, the parties
18 request a sixty (60) day extension of the discovery deadline. This is their first request to extend
19 any of the case deadlines.

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D. Proposed Discovery Deadlines

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	April 11, 2018	May 11, 2018 June 11, 2018
Deadline to Amend Pleadings	January 11, 2018	Same
Deadline to Disclose Initial Experts	February 12, 2018	Same
Deadline to Disclose Rebuttal Experts	March 14, 2018	Same
Dispositive Motions	May 11, 2018	June 11, 2018 ¹ July 11, 2018
Pre-Trial Order	June 11, 2018 (or 30 days after dispositive motions are adjudicated) ²	July 11, 2018 (or 30 day August 13, 2018 after dispositive motions are adjudicated)

IT IS SO STIPULATED.

Dated March 26, 2018

/s/ *Miles N. Clark*

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ORDER

IT IS SO ORDERED.

Dated: March 27, 2018



UNITED STATES MAGISTRATE JUDGE

¹ June 10, 2018 is a Sunday.

² June 10, 2018 is a Sunday.